UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA	**:**	
	:	
v.	**:**	**CR 08-19S**
	:	
RAFAEL O. GUZMAN	**:**	

MOTION TO CONTINUE JURY TRIAL EMPANELMENT

Now comes the defendant, by and through counsel, and hereby moves for a 30-day continuance of the jury trial empanelment in this matter currently scheduled for May 6, 2008. As grounds, counsel for Mr. Guzman is scheduled to try the matter of *State of Rhode Island v. Montrel Daniels*, P1-2007-4079AG on May 5, 2008 in Providence Superior Court. This trial is expected to last two to three weeks. Counsel is currently court excused on April 15, 2008 for the jury trial calendar call. A.U.S.A. Beckner has been notified of this request and has no objection.

Respectfully submitted
Rafael Guzman
By his attorney,

/s/ John E. MacDonald

John E. MacDonald, 5368
LAROCHELLE & MACDONALD, INC.
One Turks Head Place, Suite 1440
Providence, Rhode Island 02903
(401) 421-1440
(401) 421-1442 (FAX)

CERTIFICATION

I hereby certify that on April 3, 2008 a true copy of this document was delivered electronically using the CM/ECF system which will send notification to A.U.S.A. Sandra Beckner.

/s/ John E. MacDonald

John E. MacDonald, Esq.
Larochelle & MacDonald, Inc.
One Turks Head Place, Suite 1440
Providence, Rhode Island 02903
(401) 421-1440
(401) 421-1442 (FAX)